


Approved: 
Jennifer E. Burns/Celia V. Cohen/Christopher J. Clore
Assistant United States Attorneys

Before: HONORABLE PAUL E. DAVISON
United States Magistrate Judge
Southern District of New York

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- - - - -	x	<u>SEALED</u>
	:	<u>COMPLAINT</u>
UNITED STATES OF AMERICA	:	
- v. -	:	Violations of
	:	21 U.S.C. §§ 812,
KHALIL KHALIL,	:	841(a) (1),
a/k/a "Vinny,"	:	841(b) (1) (B),
MEDRE MEDRE,	:	841(b) (1) (C),
ALA KHALIL,	:	841(b) (2), and
a/k/a "Steve,"	:	846
MICHAEL KHALIL,	:	
a/k/a "Nick,"	:	COUNTY OF OFFENSE:
THOMAS CORCORAN,	:	WESTCHESTER
a/k/a "Tony,"	:	
KAMILE GORUR,	:	
JASON NGUYEN,	:	
ANTHONY MEDEIROS,	:	
LUIGI MIGLIACCIO,	:	
WESLEY PEARSE, and	:	
DERRICK CHAN,	:	
	:	
Defendants.	:	
- - - - -	x	

SOUTHERN DISTRICT OF NEW YORK, ss.:

GEORGE J. BURDZY, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration, and charges as follows:

COUNT ONE

1. From at least in or about April 2016 through at least on or about March 8, 2017, in the Southern District of New York and elsewhere, KHALIL KHALIL, a/k/a "Vinny", MEDRE MEDRE, ALA KHALIL, a/k/a "Steve," MICHAEL KHALIL, a/k/a "Nick," THOMAS CORCORAN, a/k/a "Tony," KAMILE GORUR, JASON NGUYEN, ANTHONY MEDEIROS, LUIGI MIGLIACCIO, WESLEY PEARSE, and DERRICK CHAN, the defendants, and

others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that KHALIL KHALIL, a/k/a "Vinny", MEDRE MEDRE, ALA KHALIL, a/k/a "Steve," MICHAEL KHALIL, a/k/a "Nick," THOMAS CORCORAN, a/k/a "Tony," KAMILE GORUR, JASON NGUYEN, ANTHONY MEDEIROS, LUIGI MIGLIACCIO, WESLEY PEARSE, and DERRICK CHAN, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were: (i) mixtures and substances containing cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B); (ii) mixtures and substances containing 3,4-methylenedioxy-methamphetamine ("MDMA" or "Molly"), a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C); (iii) mixtures and substances containing oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C); (iv) mixtures and substances containing Adderall, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (v) mixture and substances containing Xanax, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 841(b)(2).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

4. I am a Special Agent with the Drug Enforcement Administration ("DEA"). I have been employed by DEA since May 2012, a special agent of the DEA since January 2016, and a member of the DEA Tactical Diversion Squad since June 2016. I have been involved in the investigation of the above-described offense. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, including my review of pertinent documents and recordings, my participation in surveillance, and my conversations with other individuals, including fellow law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents or recordings, or the actions, statements or conversations of

others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. From at least in or about September 2016 through at least in or about November 2016, KHALIL KHALIL, a/k/a "Vinny", the defendant, used a cellphone with a call number ending in 8111 (the "8111 Number").¹ On or about September 22, 2016 and October 27, 2016, the Honorable Cathy Seibel, United States District Judge for the Southern District of New York, issued Orders of Interception pursuant to the provisions of Chapter 119 of Title 18, United States Code ("Title III"), authorizing the interception and recording of wire and electronic communications over the 8111 Number (collectively, the "8111 Wires").

6. From at least in or about November 2016 through at least in or about February 2017, KHALIL KHALIL, a/k/a "Vinny", the defendant, used a cellphone with a call number ending in 8598 (the "8598 Number").² On or about November 15, 2016, December 19, 2016,

¹ Telephone records show that during the relevant time period, the 8111 Number was subscribed to in the name of "Locus Communications, 951 N Walnut Creek Dr., Ste. C, Mansfield TX 76063," and that service to the cellphone assigned the 8111 Number was provided by Sprint. Law enforcement has determined that KHALIL KHALIL, a/k/a "Vinny," the defendant, used the 8111 Number through, amongst other things, communications and meetings with an undercover officer ("UC-1"). For example, on or about May 6, 2016, UC-1 exchanged a series of text messages with the user of the 8111 Number setting up a time and a place to meet in order for UC-1 to purchase oxycodone. The user of the 8111 Number instructed UC-1 to come to an apartment at 790 Tuckahoe Road in Yonkers. UC-1, wearing a recording device, went to 790 Tuckahoe Road and went inside an apartment, where UC-1 purchased oxycodone from the occupant and the occupant gave UC-1 a bag of cocaine. UC-1 was subsequently shown an arrest photo of KHALIL KHALIL, and UC-1 stated that that was the same person with whom UC-1 had conducted the narcotics transaction described here. In addition, the building directory lists "Khalil Khalil" as the resident of the apartment where the transaction occurred, and public records list that address as an address for a person named "Khalil "Khalil."

² During the relevant time period, the service provider for the 8598 Number was Sprint. Sprint has advised law enforcement that there is no subscriber information for the 8598 Number. Based on my training and experience, I have learned, in substance and in part, that service providers like Sprint often do not require subscriber information for prepaid telephones. Based on my

and January 20, 2017, the Honorable Cathy Seibel, United States District Judge for the Southern District of New York, issued Orders of Interception pursuant to Title III, authorizing the interception and recording of wire and electronic communications over the 8598 Number (collectively, the "8598 Wires," and, together with the 8111 Wires, the "Khalil Wires").

training and experience, and my involvement in this investigation, I have reason to believe that the 8598 Number is assigned to a prepaid cellphone.

However, the 8598 Number is listed with Con Edison as the phone number for a person named "Khalil Khalil," residing at 328 E. 77th St., 1-A, New York, New York. This is known to be the current address of KHALIL KHALIL, a/k/a "Vinny," the defendant since in or about October 2016 based on the fact that the user of the 8598 Number directs narcotics customers to the address, and law enforcement officers conducting surveillance at this address have observed the same person as is depicted in an arrest photograph of KHALIL KHALIL entering that address.

Moreover, through analysis of telephone records, together with communications intercepted over the 8111 Wires, law enforcement has confirmed that KHALIL KHALIL, a/k/a "Vinny," the defendant, used the 8598 Number during the relevant time period. For example, on or about September 30, 2016, at approximately 7:10 p.m., KHALIL KHALIL received an incoming call on the 8111 Number from a call number ending in 2012 and subscribed to by WELSEY PEARSE, the defendant (see *infra* n. 22). Based on my review of the intercepted communication and my communications with other law enforcement agents who also reviewed the intercepted communication, I know that, approximately two minutes into the communication, a person with the same voice as KHALIL KHALIL can be heard on the 8111 Number making a separate phone call in the background in which that person stated, in substance and in part: "Tony, go to, uh, ok, you're going to go to 54th and 2nd and, after you're done, you're just gonna wait there. You're gonna meet Wes and I'll tell you what he's getting when you get there." Based on my conversations with law enforcement agents, I understand "Tony" to be THOMAS CORCORAN, the defendant. Based on my analysis of toll information for the 8598 Number, I have learned that, at the time that the person with the same voice as KHALIL KHALIL called "Tony" from the separate phone, the 8598 Number was calling a telephone with a call number ending in 9954, which law enforcement believes is used by CORCORAN (see *infra* n. 16).

7. Based on my conversations with law enforcement agents and my review and analysis of communications intercepted over the Khalil Wires, I have learned in substance and in part, that interceptions over the Khalil Wires included interceptions of communications between KHALIL KHALIL, a/k/a "Vinny," and MEDRE MEDRE, ALA KHALIL, a/k/a "Steve," MICHAEL KHALIL, a/k/a "Nick," THOMAS CORCORAN, a/k/a "Tony," KAMILE GORUR, JASON NGUYEN, ANTHONY MEDEIROS, LUIGI MIGLIACCIO, WESLEY PEARSE, and DERRICK CHAN, the defendants. These intercepted communications included discussions regarding the purchase and sale of significant quantities of narcotics, including cocaine, MDMA (also known as "Molly"), oxycodone, Adderall, and Xanax.

8. Communications intercepted over the Khalil Wires, together with visual surveillance and other investigative techniques, has revealed the following about KHALIL KHALIL, a/k/a "Vinny," MEDRE MEDRE, ALA KHALIL, a/k/a "Steve," MICHAEL KHALIL, a/k/a "Nick," THOMAS CORCORAN, a/k/a "Tony," KAMILE GORUR, JASON NGUYEN, ANTHONY MEDEIROS, LUIGI MIGLIACCIO, WESLEY PEARSE, and DERRICK CHAN, the defendants:³

KHALIL KHALIL, a/k/a "Vinny"

a. KHALIL KHALIL runs a drug trafficking operation that sells high volumes of a variety of narcotics, including cocaine, oxycodone, MDMA (also known as "Molly"), Adderall, and Xanax, in the Southern District of New York and elsewhere. KHALIL KHALIL's role in the drug trafficking operation is further illustrated in the paragraphs that follow, including the paragraphs describing the conduct of the other defendants.

b. On or about April 22, 2016 at approximately 12:47 p.m., an undercover law enforcement officer ("UC-1") arranged to purchase oxycodone from KHALIL KHALIL by sending a text message to the 8111 Number stating: "hey whats up, Billy told me to shoot you a text."⁴ KHALIL KHALIL responded to UC-1 by text message from the 8111 Number: "My driver will be in my house from 3:30-5:30pm,"

³ Where I refer to the contents of previously recorded communications, my quotations and descriptions are based on preliminary draft summaries and transcriptions, my review of the recordings, and/or my discussions with other individuals.

⁴ Unless otherwise noted, all communications between UC-1 and KHALIL KHALIL using the 8111 Number have been recorded. Additionally, all communications between UC-1 and KHALIL KHALIL using the 8111 Number have been verified by reviewing the toll records for the 8111 Number.

which KHALIL KHALIL texted was located at "790 Tuckahoe Rd Yonkers". UC-1 arranged to purchase 60 oxycodone pills from KHALIL KHALIL for \$2,100. That day at approximately 5:23 p.m., UC-1 contacted KHALIL KHALIL on the 8111 Number and stated that UC-1 had arrived and that UC-1 was in a black Honda Accord. KHALIL KHALIL stated that his contact's name was "Tony."⁵ UC-1 stated "just to verify, it's 21 for 60 right?" KHALIL KHALIL responded "Correct, exactly. My driver's already there. He already has the 60 ready so all you have to do is give him the, when you get to the door, when you get to the front door, he's going to open the door for you. You go inside my apartment and just whatever, give him the \$2100 and he'll give you the blue um the 60." KHALIL KHALIL then sent a text message from the 8111 Number which stated: "My driver is there already anytime you ready." UC-1 was outfitted with a recording device and recorded the meeting with "Tony." After UC-1 arrived at 790 Tuckahoe Rd at approximately 5:26 p.m., "Tony" got into UC-1's car and handed UC-1 a clear plastic Ziploc bag containing 60 blue colored pills and stated "Sixty to the note." UC-1 then gave "Tony" \$2,100. "Tony" got out of the car and UC-1 left the area. The pills purchased by UC-1 were submitted to the lab for testing which confirmed they were 30 milligram oxycodone tablets.

MEDRE MEDRE

c. MEDRE MEDRE is long-time associate of KHALIL KHALIL. MEDRE and KHALIL KHALIL engage in selling cocaine, oxycodone, Adderall, and Xanax, both with each other and independently.

d. On or about November 29, 2016, at approximately 11:27 a.m., KHALIL KHALIL received an incoming call on the 8598 Number from MEDRE MEDRE using a call number ending in 3208 (the

⁵ Law enforcement has confirmed that "Tony" is THOMAS CORCORAN. "Tony" arrived at the April 22, 2016 controlled buy in a grey Mazda3. On a subsequent date, law enforcement conducted a traffic stop of that car, and the driver produced a driver's license in the name of "Thomas Corcoran." Additionally, UC-1 was shown the driver's license photograph of THOMAS CORCORAN, and UC-1 confirmed that CORCORAN was the person from whom he purchased oxycodone on April 22, 2016.

"3208 Number") (Session 3168).⁶ During that call, the following conversation, in substance and in part, took place:

MEDRE: Yeah. You know me I'm always just a few thousand off, never too much high [laughs]. I saw Darwish the other day.

KHALIL: Yeah, you know that nigga blocked me from Snap Chat, because that nigga is...
[Voices Overlap]

MEDRE: He is trying to sell me everything under the sun, literally. He was like, "Oh, I got percs sorry." I got a a thousand percs. He's like, "What about 'xannies'?" I got like 1,700 xannies. He's like, "Addies"? I was like, "Sorry, I already have like 200 Addies which is more than enough."

KHALIL: Yo, Medre, trust me when I tell you my nigga, this is the time right now [Foreign Language] you know me, I don't advertise if and I don't even [stutters] I would never want to give you my [foreign language] something like that. Trust me when I tell you this is an opportunity now for you, if you need [foreign language] yo, I got them shits on deck like fucking crazy.

Based on my experience, training, and investigation of this matter, I believe that, during this phone call, KHALIL KHALIL and MEDRE were discussing a conversation that MEDRE had with another individual named "Darwish," during which Darwish attempted to sell MEDRE Percocet pills ("percs"), Adderall pills ("addies") and Xanax pills ("xannies"). During the conversation, KHALIL KHALIL explained to MEDRE that KHALIL KHALIL had those pills available if MEDRE needed them ("I got them shits on deck like fucking crazy").

e. On or about December 22, 2016, at approximately 12:24 p.m., KHALIL KHALIL placed an outgoing phone call using the 8598 Number to MEDRE MEDRE on the 3208 Number (Session 5725). During that call, the following conversation, in substance and in

⁶ On or about November 26, 2017, at approximately 9:30 p.m., KHALIL KHALIL, using the 8598 Number, received a telephone call from the 3208 Number, in which a male with the same voice as the male intercepted using the 9042 number and believed to be MEDRE MEDRE (see *infra* n. 8) told KHALIL KHALIL that the 3208 Number was his new number and that he gets a new number every three weeks "so no one can tap."

part, took place:⁷

MEDRE: Yup

KHALIL: What?

MEDRE: You're coming back with Ala, right? Tomorrow?

KHALIL: Ha?

MEDRE: You supposed to back tomorrow?

KHALIL: God's willing, why? What's going on?

MEDRE: Answer me . . . back tomorrow?

KHALIL: What the fuck! How many times you going to repeat it?
[Voices Overlap]

MEDRE: I have a package over there. I need you to pick up a package from my house and bring it with you.

KHALIL: What type of package you're talking about? It ain't nothing illegal, is it?

MEDRE: Of course it's illegal, what the fuck, mother fucker, it should be good just do it.

KHALIL: Is this merchandise?

MEDRE: Exactly, yeah. A couple of small pieces...is going to be able to hold me over till the New Years. Is nothing big.

KHALIL: Nothing big, nothing big...what the fuck, keeping stuff there...are you dumb?

MEDRE: I had it shipped there, because I thought I was going to be there till now and I was going to bring it back with me.

KHALIL: You're dumb bird. Why would bring here in the first place, even if you were going to stay here?

MEDRE: No, I thought that I was going to be there till now and then I'm going to drive it back with [audio breaks] nobody was in my house.
[Voices Overlap]

KHALIL: My question is what is it doing here in the first place?

MEDRE: What I'm saying is, it was shipped there.

KHALIL: Oh! Ship, ship, I got you, I got you.

MEDRE: Shipped, yes...already my neighbor has already the shit, you know what I'm saying? But um...I'm just...

KHALIL: Just for the record...
[Voices Overlap]

MEDRE: And it's not [audio breaks]

KHALIL: What is it, is it pills or pills?

MEDRE: Okay...No, no, is not just pills...it is MDMA, K and some pills, very small pills...nothing major, put it

⁷ Portions of this call were translated from Arabic.

like this, Shitty shit from our asses...he could literally stash it up.

KHALIL: Is it small enough to like hide it somewhere?

MEDRE: It has to be [Stutters] you don't understand me, it's gonna take you 15 minutes, no problem, you know what I'm saying?

KHALIL: Okay, now the other question is, who am I meeting to get it from? You're mom, your wife where it it in Yonkers?

MEDRE: No, no, no, you're not meeting anybody, hell no! Nobody is there except the wife, they shipped it there, I'm only telling you, because I know I mean, you already know...me and you. So...I didn't want to call Ala in Yonkers, to be honest with you, because I know Ala will be on some bitch shit, you know what I'm saying?

[Voices Overlap]

KHALIL: No, no, that's the thing, I'm going to be honest with you. I'm not gonna give him the fucking car [audio breaks] [laugh]

MEDRE: It ain't that serious, I can take a flight there and bring it back with me. It ain't that serious I just don't want...I didn't...

[Voices Overlap]

. . . .

Based on my experience, training, and investigation of this matter, I believe that, during this call, KHALIL KHALIL and MEDRE were discussing a shipment of pills and other substances ("is not just pills...it is MDMA, K, and some pills") that MEDRE ordered. MEDRE was also asking KHALIL if he would pick up the shipment. KHALIL KHALIL agreed ("Okay, now the other question is, who am I meeting to get it from?").

f. On or about January 9, 2017, at approximately 8:17 p.m., KHALIL KHALIL received an incoming call on the 8598 Number from MEDRE MEDRE using a call number ending in 9042 (the "9042

Number") (Session 8253).⁸ During that call, the following conversation, in substance and in part, took place:⁹

. . . .

MEDRE: I know remember those days champ? All night champ
 KHALIL: Some days were regular days. Those days are like regular day, especially blues customers
 MEDRE: I remember one day when I went out I was happy I got rid of 75 blues. Yo I come to find out all of it is credit. [Laughs] That shit was hilarious dude. Oh my God it was crazy.
 KHALIL: Word up.
 MEDRE: My blue customers right now. I have only a little bit of blues, I was getting 20-30 here and there my nigga, I started perc -- 10 like water, like water I probably sold 200 in two days of percs.
 KHALIL: I know somebody who got a 100 fucking bananas right now. He selling them at 10 dollars each I don't think...
 MEDRE: Tell him to suck my cock, tell him I said rather just take the white ones. And you know who tried to play me like that, what's his name?...
 KHALIL: I am learning a lot about you, I think seven dollars is fair
 MEDRE: Okay yo my dude, seven dollars is worthy I made double, you understand what I saying?
 KHALIL: If you think about it, if [you] don't got blues, if you don't got blues, if you can sell the bananas at 20 dollars a pop at minimum, at minimum if you get one of your [Unintelligible] customers to buy a hundred for one shot and give it to him at 15 dollars still that's a 500 hundred dollars profit.
 MEDRE: Well man at 13 it they take 100 [Unintelligible] just because I don't [Unintelligible] blues

⁸ Public records list the 9042 Number as the phone number for a person named "Medre Medre." In addition, the male using the 9042 Number has identified himself as "Medre" in communications with KHALIL KHALIL. Furthermore, according to subscriber records, the subscriber of the 9042 Number is Yonkers Linen & More, using an address which, according to public records, is the residence of a person named "Medre Medre." Lastly, law enforcement officers conducting surveillance of that residence have observed the same individual as is depicted in an arrest photo of MEDRE MEDRE enter that address.

⁹ Portions of this call were translated from Arabic.

KHALIL: Nigga I bought a 100 [Unintelligible] in less than an hour. Nigga had 700 [Unintelligible] blues no he doesn't have no blues

MEDRE: The problem is I had 700 and bought 600 in between. [Laughs]

KHALIL: Word up

MEDRE: I remember the days when I couldn't get rid of 100 in a month and a half maybe two that's with Khalil helping me. [Laughs]

KHALIL: Listen, obviously common sense, if you don't go, get your driver meeting me. If you get any blue customers up to 23, you know what I am saying?

MEDRE: Oh yeah, yeah I send you guys.

. . . .

KHALIL: What you're saying? I don't understand

MEDRE: I had to come back I needed what do you call it?

KHALIL: What you needed?

MEDRE: I needed blue dude. I had to bring money to make sure I had all money because you said I might be able to buy five, six hundred right?

KHALIL: God willing. You know these motherfuckers.

MEDRE: I got another 200 coming tomorrow too, plus another 300 in [Unintelligible].

KHALIL: Oh my God when I don't need blues, they bring me 1,000. Now when [I] got you ready with the money no one came today. Over the weekend everybody was telling me Monday, Monday, Monday, Monday.

MEDRE: They drove me crazy dude New Years, before New Years they drove me crazy I was denying blues literally, I was like dude I am sorry, wait until after New Years and now I am ready to buy [Unintelligible] 500 oh no there's none available, it's not available, not available. I be like okay no problem.

KHALIL: That's our motherfucking luck [unintelligible] fuck it.

MEDRE: Nigga, I got this nigga willing to sell me two to four hundred but I told...

KHALIL: [Talks aside with someone else] Right this way, right this way, what's up brother? How you doing? Yo I am sorry for the delay. How many dude?

UM: Ah 6 if you can. It's fucking cold out there.

KHALIL: Yes sir. Hold that. [Counts] How is the night going man? So you just like the Blues.

UM: So I do. [Both laugh] [Unintelligible]

KHALIL: Well good luck brother. You be good bro. The boy tells

me . . . knee problems that's why I've been seen you so much I told him oh I thought you just like the blues. [both laugh]

MEDRE: You're fucked up yo. Let the man tell you like that and you tell him that's why, I understand someone told me . . . I had a bad accident bro and I can't get enough. They not giving me enough. I can't wait for my prescription to refill. You know what I used to see you before the accident.
[Giggles]

KHALIL: That's crazy, like you I swear out of all my customers -- and I have a whole bunch for blues -- only one customer, only one [Unintelligible] customer his name is Larry, I swear he's the only motherfucker that truly needs it because of pain. Fuck the rest of them. The rest of them they just love that shit.

MEDRE: [Laughs] That's crazy.

KHALIL: Yo customers are fucking retards.
[Voices Overlap]

MEDRE: They think we judging them.

KHALIL: When I first started this business you know I was one of those guys that you know I didn't like somebody in [sic] drug dealer. You know what I'm saying? So even when I first started the people that call someone "oh you're a drug dealer." They look at you like garbage you're a drug user.
[Chuckles]

MEDRE: No, oh yeah I remember you told me that story. My nigga that shit was fucked up. I, literally left a, a, dude hanging right there on McDougal and Bleecker. I think it was, I forgot what crossing. He's just like dude, cause I told him it's 2 minimum it was like 3 o'clock in the morning right? I was already there and I came back from the upper west side and he was like oh I only want one, I have to get [Unintelligible]. I'm like get out of my car.

KHALIL: That's crazy

MEDRE: I was like get out of my car I don't need your \$100.00. Oh that's a cute Rolex, I got 7 them.

KHALIL: Fucking crazy.

. . . .

Based on my experience, training, and investigation of this matter, I believe that, during this call, KHALIL KHALIL and MEDRE were discussing their history of illegally selling controlled substances such as Percocet ("percs") and oxycodone ("blues"). During this call, KHALIL KHALIL and MEDRE also discussed MEDRE

travelling back from Buffalo for the purpose of buying 500-600 oxycodone pills from KHALIL KHALIL ("KHALIL: What you're saying? I don't understand; MEDRE: I had to come back I needed what do you call it?; KHALIL: What you needed?; MEDRE: I needed blue dude I had to bring money to make sure I had all money because you said I might be able to buy five six hundred right?; KHALIL: God willing you know these motherfuckers."). In addition, during this call, KHALIL KHALIL was recorded selling oxycodone pills to a customer ("UM"). KHALIL KHALIL and MEDRE then discussed how their customers claim to have a medical need for oxycodone when in reality, "they [the customers] just love that shit."

g. On or about February 8, 2017, at approximately 4:45 p.m., KHALIL KHALIL, a/k/a "Vinny", received an incoming call on the 8598 Number from MEDRE MEDRE using call number the 9042 Number (Session 11279). During that call, the following conversation, in sum and substance took place:

KHALIL: So you guys are finally back?
 MEDRE: Yeah we just got back a couple of hours ago.
 KHALIL: From Buffalo or New York?
 MEDRE: No I am in NYC, but you know what's bugging me out my niggard?
 KHALIL: What?
 MEDRE: I swear to God I am going crazy. I called 6 different people and nobody... I am talking about the guys that I usually give 21 to... that want to fuck me off for 21 and 22. They can't get me no blues. He is like "I don't believe you you are going to pay 21 or 22 or 21.50." I was like "I'll do it". At this point I have no choice. I need them. I am losing a ton of money.
 KHALIL: Word up.
 MEDRE: Put it like this. The minute I get my hands on 300, it's on.
 KHALIL: Of course.
 MEDRE: Like literally... you too I am sure. I mean I don't know [Unintelligible] but believe me it's dry, I am screwed. And what's killing me it's I am going to lose into other people.
 KHALIL: Yep.
 MEDRE: That [Stutters] are going to charge me more by the way for 40 bucks a pop.
 KHALIL: Shit. This is the time where we are supposed charging our customers 40 dollars each.
 MEDRE: Niggard my customer himself told me he'll give me 50 a pop. One of my customers told me he'll give me 50 a pop, just give me 5 for 10. Just to hold me over. He

is like "I will pay". I was like "dude if I had it you would have it, it's not about the money, it's not available. This is why I tell you guys don't [Stutters] pick up 5 and 6 and 7 and expect it to be there every single time because it's not going to be there every single time."

KHALIL: Correct. Oh yeah.

MEDRE: Dude you have anything in the works? I mean so far I have 3 people telling me they going to get 200 a pop, but I haven't seen shit yet.

KHALIL: Brother right now I am crossing my balls, not my fingers, I'll get something on Friday...

[Voices Overlap]

MEDRE: [Unintelligible] Yo no way somebody told me Friday too.

KHALIL: Yeah so let's see what happens. I told you I already bought 200 but sold, like sold.

MEDRE: No of course. Niggard I am not going to tell you sell me the 200. I am talking about you getting 600, 500, 900, shit I'll take anything even 50 and I'll stretch them.

[Voices Overlap]

KHALIL: Of course, of course.

MEDRE: No you gotta worry first about Khalil then you worry about me. First of all you owe money. Fuck that.

KHALIL: No trust me this is... I am waiting for my big orders [Stutters] hopefully on Friday I'll get...

MEDRE: This is what going to piss me off, right. We are waiting for the little orders, and they are going to come in, they are going to take the majority of the money. And then we'll need more money, and we got like 900 swinging in 2 days and we don't have the fucking cash, we are fucked.

KHALIL: Oh yeah papi.

MEDRE: That shit is pissing me the fuck off. Literally I got like 20 [Unintelligible] waiting. That's besides what I have with you?

Based on my experience, training, and investigation of this matter, I believe that in this portion of the call, KHALIL and MEDRE were discussing difficulty they were having in obtaining oxycodone ("They can't get me no blues."). MEDRE stated he was eager to restock - "The minute I get my hands on 300, it's on." - to sell to his customers. MEDRE further stated that customers were willing to pay \$50 per pill ("my customer himself told me he'll give me 50 a pop").

The call continued:

MEDRE: I am ... fuck yo. I am bugging out. I can't believe I have no blues. It's fucking sick yo. Away you don't really worry about it too much, but now that I am back and I have zero, it's like we . . . [Unintelligible]
[Voices Overlap]

KHALIL: When I am away I just be telling my customers I am not in town. My driver ain't got it. just blame it on the driver ain't got it. You know what I am saying?

MEDRE: I was telling them my sources don't deal with my drivers. That's exactly what I was telling them.

KHALIL: You know but um...

MEDRE: And they say "oh yeah we totally understand" but being that I don't have nothing it's usually I have a stash. Yo I am like hoping I have [Unintelligible] laying around somewhere. [Laughs] I kicked the whole house.

KHALIL: Medre you know what the crazy shit is? Niggard I looked out for you for at least 1200 last whatever couple of weeks. Like imagine I didn't give even you those 1200 right there?

MEDRE: Oh yeah, I [Stutters] literally would have got fucked around. My niggard I told you I get [] of blues.

KHALIL: Yes no doubt. But trust me, you'll get there. The blues [Unintelligible] it's very simple. When people find out you got, you should get more customers and more customers. That's an easy job to do.

MEDRE: Yo I swear to God you said that and that's exactly we talk by the way. Half of my customers are blues. Half my workload is blues.

KHALIL: Of course.

MEDRE: So if I don't have blues...
[Voices Overlap]

KHALIL: I'll be honest with you. I swear by the Quran I sell a lot of white. But you know what? [T]o choose white or blues, I'd rather stick with the pills' business.

MEDRE: Oh fuck yeah. Dude no other way, you have to. It's every fucking day no matter what -- sleet, shine, storm...

KHALIL: Niggard on my point I fucking sell. I tell you 100 a day but I swear by Quran...

MEDRE: No you at least... between me and you I think you get rid of 150 to 200 minimum.

KHALIL: Listen let's just say, you know what? Let's just say 1000 a week. Let's just say 1000 [a] week. I don't wanna say too much and I don't wanna say it too less.

I get rid of 1000 a week. Niggard 1000 times fucking 1400. Um that's 14000 [Unintelligible] I am making \$14,000 my niggard in profits. \$14000 in profits a week with the blues. Just on blues. That shit make me sick to my stomach when I do the math and I am like where the fuck is my money.

MEDRE: Where the fuck is my money. That's what I say [Unintelligible] Where the fuck is my money.

KHALIL: And I just counted 14,000 that's just my profits, I am not even counting the... [Voices Overlap]

MEDRE: [Unintelligible] everything else.

KHALIL: No the actual \$21. So I am not counting the fucking \$35,000

MEDRE: Oh god Man. But that doesn't show you one small thing that we are not realizing. I don't know if you are realizing this. We are getting a lot of money in and it's not even coming all in cash, which is a problem.

KHALIL: Yeah. Yeah. The next step, you know the other day you were saying, you ain't gonna [have] no more houses and blah blah blah. Yo my niggard, my next goal I am going to pay off everything. Yo

MEDRE: I don't want to owe any car... I mean if you are leasing, you are different than me. I am not leasing, I am financing. I am going to pay off my fucking card, I am going to pay off my credit, I am going to pay off everything yo I am done man. I am done fucking buying shit... [Voices Overlap]

MEDRE: Niggard you know what I want to do? Hold on stay on the line. [Aside: yo what's up buddy? you got it? what's up? yes, yes, yes you buy ten you get eleven. Bye] Yeah.

KHALIL: Yeah. I can't believe you do that stupid Xanax shit. I don't do that shit... [Voices Overlap]

MEDRE: Between me and you, I am going to keep it real with you, between me and you I get fucking Xanax at \$2, you know what I am saying? And I have been pushing Xanies heavy. [Voices Overlap]

KHALIL: No doubt.

MEDRE: And I know you are probably saying "Medre you are crazy, you shouldn't do that" but over a... [Voices Overlap]

KHALIL: No, no, no look. You do what you gotta do. Me

personally when it comes to Xanies especially... you know what I am Okay with blues, I am okay with Addies if people don't buy 10 minimum because to tell you the truth, I don't want them to buy 10 minimum because I want to please everybody, you know what I am saying?

MEDRE: Yes.

KHALIL: But Xanies, my niggard I've been doing \$10 each, 10 minimum and yo, the thing is they don't even bite. Yo I stopped saying 10 minimum. Yo MEDRE lately I don't understand where my customers been up to with these Xanies. But yo I got Xanies that people gonna be buying 8, 80, people that be buying fucking 30, people that buy 40.

Based on my experience, training, and investigation of this matter, I believe that in this portion of the call, KHALIL KHALIL and MEDRE were discussing again their issues with getting oxycodone from suppliers ("I can't believe I have no blues."). KHALIL KHALIL stated that selling oxycodone was a good and "easy" business ("The blues [Unintelligible] it's very simple. When people find out you got, you should get more customers and more customers. That's an easy job to do."). KHALIL KHALIL and MEDRE agreed that had KHALIL KHALIL not obtained 1200 pills for MEDRE, MEDRE would have had issues with customers. KHALIL KHALIL further stated that he sells a lot of cocaine - the "white" - but prefers to sell oxycodone ("I'll be honest with you. I swear by the Quran I sell a lot of white. But you know what? to choose white or blues, I'd rather stick with the pills business."). KHALIL KHALIL stated that he makes a great profit from the oxycodone sales of \$14,000 per week ("I get rid of 1000 a week. Niggard 1000 times fucking 1400. Um that's 14000 [Unintelligible] I am making \$14,000 my niggard in profits. \$14000 in profits a week with the blues"). MEDRE stated that he has been focusing on selling Xanax pills ("pushing xanies heavy").

ALA KHALIL, a/k/a "Steve"

h. ALA KHALIL is the brother of KHALIL KHALIL. ALA KHALIL acted as a courier for KHALIL KHALIL, completing numerous narcotics transactions on behalf of KHALIL KHALIL that had been arranged by KHALIL KHALIL. These transactions involved, amongst other narcotics, cocaine and oxycodone.

i. On or about January 14, 2017, at approximately 6:54 p.m., KHALIL KHALIL received an incoming call on the 8598 Number from ALA KHALIL using a call number ending in 1917 (the "1917

Number") (Session 8467).¹⁰ During that call, the following conversation, in substance and in part, took place:

ALA KHALIL: You said 86th and Madison, right?

KHALIL KHALIL: Yeah, 12 blue.

ALA KHALIL: Uh?

KHALIL KHALIL: 12 [audio breaks] burry [sic] up, bye.

Based on my experience, training, and participation in the investigation of this matter, I believe that, during this phone call, KHALIL KHALIL and ALA KHALIL were discussing a narcotics transaction that KHALIL KHALIL had set up. Specifically, ALA KHALIL confirmed with KHALIL KHALIL the location of the transaction ("You said 86th and Madison, right?"). KHALIL KHALIL confirmed the location and informed ALA KHALIL that the customer would purchase approximately 12 oxycodone pills ("Yeah, 12 blue.").

j. On or about January 16, 2017, at approximately 12:40 p.m., KHALIL KHALIL made an outgoing call on the 8598 Number to ALA KHALIL using the 1917 Number (Session 8737). During that call, the following conversation, in substance and in part, took place:¹¹

ALA KHALIL: Yo!

KHALIL KHALIL: [Unintelligible] answering the phone, alright. I got people starting to come see you. Someone will be here in 15 minutes his name is Steve, okay and then I got another guy will be there at 2 o'clock. Um, the guy at 2 o'clock, I owe him \$250 that's why I left you the \$2,000 there. That way you can be paying the debt as you go. Don't get me wrong, I owe him \$250 he's getting blues. I don't know how much blues he's getting but whatever. I owe him \$250. I'll let you know as they come.

ALA KHALIL: Okay. [Yawning] text me when Steve is here.

KHALIL KHALIL: Bye.

¹⁰ An individual named "Ala Khalil" lists the 1917 Number as his phone number on his Facebook page. I have reviewed images of the individual named "Ala Khalil" that appear on this Facebook account, and I have participated in surveillance of ALA KHALIL, and I believe they are the same person. Accordingly, I believe that the 1917 Number is used by ALA KHALIL.

¹¹ Portions of this call were translated from Arabic.

Based on my experience, training, and participation in the investigation of this matter, I believe that, during this phone call, KHALIL KHALIL were explaining to ALA KHALIL that customers would be visiting ALA KHALIL to purchase narcotics ("I got people starting to come see you."). One customer in particular, would be visiting ALA KHALIL to purchase an undisclosed amount of oxycodone pills ("he's getting blues. I don't know how much blues he's getting but whatever").

k. On or about January 30, 2017, at approximately 9:49 p.m., KHALIL KHALIL received an incoming call on the 8598 Number from ALA KHALIL using the 1917 Number (Session 9869). During that call, the following conversation, in substance and in part, took place:¹²

KHALIL KHALIL: Yeah?

ALA KHALIL: Are you busy?

KHALIL KHALIL: Yeah, what's up?

ALA KHALIL: I wanted to tell you that I only have 1 white, only one.

KHALIL KHALIL: That's fine, that's fine, that's perfect.

ALA KHALIL: What do you mean "that's perfect"?

KHALIL KHALIL: Right now you're gonna go to those and then you're gonna go to James in Queens, he wants one blue and you're good.

ALA KHALIL: No, should I call Medre just for ten, just in case?

KHALIL KHALIL: If you want to, sure.

ALA KHALIL: I've already called him. I said I am gonna ask Vinny first, but I'm probably gonna need at least 10, you know.

KHALIL KHALIL: Yeah, no more than ten, no more, but, ah, always to make a long story short, nigga called just couldn't answer him, but, ah, . . . right now.

ALA KHALIL: No, he called you because he wanted the blue that's why he called you.

KHALIL KHALIL: All right, tell him tomorrow 'cause I am in Yonkers tomorrow, just tell him to come to Yonkers tomorrow in the afternoon [unintelligible] send you to meet him.

ALA KHALIL: I can't hear anything. You got me on speaker?

KHALIL KHALIL: You go to Brooklyn, then Queens, then you can meet him.

ALA KHALIL: Oh, ok, ok, no doubt.

¹² Portions of this call were translated from Arabic.

Based on my experience, training, and participation in the investigation of this matter, I believe that, during this phone call, ALA KHALIL was informing KHALIL KHALIL that he only had one bag of cocaine ("I only have 1 white, only 1"). KHALIL KHALIL explained that one bag of cocaine was okay, because the next customer wanted oxycodone ("Right now you're gonna go to those and then you're gonna go to James in Queens, he wants one blue you're good."). ALA KHALIL then asked if he should call MEDRE MEDRE for additional amounts of cocaine for sale ("No, should I call Medre just for ten, just in case?"). KHALIL KHALIL and ALA KHALIL also discussed an anticipated narcotics sale in Yonkers the next day.

1. On or about January 31, 2017, KHALIL KHALIL, using the 8598 Number, placed an outgoing call to ALA KHALIL on the 1917 Number (Session 9933). During that call, the following conversation, in substance and in part, took place:¹³

ALA KHALIL: Hello?

KHALIL KHALIL: Yeah, I got Frank, he's about to be there right now. Give him 100 blues for the flat fee \$100. He is going to pay you all cash.

ALA KHALIL: You are taking advantage; nigga. You used to give me \$200 flat fee. How come you are going down to \$100 now, nigga?

KHALIL KHALIL: Brother, brother, brother, because they are coming knocking on your door. You are not driving, you are not taking no risks, you are not doing anything.

ALA KHALIL: What a fucking scumbag you are.

KHALIL KHALIL: I'ma start call you Michael from now on.

ALA KHALIL: No, no, no. I'm not complaining, but don't start me off at \$200 flat fee and bring me down. . .
[Voices Overlap]

KHALIL KHALIL: I am starting to fucking pay you off and you already trying to fucking, uh, step on me when he is down.

ALA KHALIL: No, no, no. I told you let me know everything from the beginning. You can't start me off at \$200 flat fee and then bring me down to. . .
[Voices Overlap]

KHALIL KHALIL: No, no, no.

ALA KHALIL: I don't give a fuck.

KHALIL KHALIL: It's all difference, brother. It's all different. Alright, so yeah, so he is coming and then there is another flat fee, um, Larry, he is going to get 60, so it's another 21, so another \$100. So, look, these

¹³ Portions of this call were translated from Arabic.

are three flat fees, that's \$300 alone. You work at your own business and you don't make \$300.

ALA KHALIL: Fuck my business bullshit.

KHALIL KHALIL: It ain't no, fuck all this bullshit. This is my fucking sweat and tears.

. . . .

Based on my experience, training, and my participation in the investigation of this matter, I believe that, during this conversation, KHALIL KHALIL was informing ALA KHALIL that a customer ("Frank") would be visiting ALA KHALIL to purchase 100 oxycodone pills for a flat fee ("I got Frank, he's about to be there right now. Give him 100 blues for the flat fee \$100. He is going to pay you all cash."). ALA KHALIL explained that \$100 flat fee was too little because it did not leave ALA KHALIL with much money to keep as payment for completing the transaction ("You are taking advantage, nigga. You used to give me \$200 flat fee. How come you are going down to \$100 now, nigga?").

MICHAEL KHALIL, a/k/a "Nick"

m. MICHAEL KHALIL is the cousin of KHALIL KHALIL and made deliveries of narcotics for, and collected payments on behalf of, KHALIL KHALIL.

n. On or about September 8, 2016, law enforcement conducted a controlled purchase of narcotics during which KHALIL KHALIL sold 30 milligram oxycodone tablets for \$2,100 to UC-1. When arranging the transaction, KHALIL KHALIL, using the 8111 Number, stated: "Perfect, I'm sending you my cousin Nick, He will be driving a black Cadillac ATS." Law enforcement identified "Nick" as MICHAEL KHALIL based upon the registration information for the vehicle in which MICHAEL KHALIL arrived to the controlled buy location in Yonkers, New York. That vehicle is registered in the name of MICHAEL KHALIL. In addition, UC-1 identified MICHAEL KHALIL as "Nick" from a photo array.

o. Furthermore, in intercepted communications, KHALIL KHALIL told customers that "Nick" would deliver their narcotics. For example, on or about October 17, 2016, KHALIL KHALIL, using the 8111 Number, sent a text message to a customer which stated "Fyi its 53rd btwn bway&7th Nick (he will give you a coffee cup)." Similarly, on or about November 5, 2016, KHALIL KHALIL, using the 8111 Number, sent a text message to a customer regarding his cocaine purchase stating "Black Cadillac ats Nick." MICHAEL KHALIL used a Black Cadillac when delivering narcotics to UC-1.

p. MICHAEL KHALIL has also been intercepted

communicating with KHALIL KHALIL about delivering narcotics. KHALIL KHALIL provides the drug type, drug amounts, delivery locations, and dollar amounts to collect in text messages to and phone calls with MICHAEL KHALIL. The following are examples of those communications:

i) On or about November 21, 2016, at approximately 2:43 a.m., KHALIL KHALIL sent a text message using the 8598 Number to MICHAEL KHALIL using a call number ending in 0676 (the "0676 Number") (Session 1189).¹⁴ In that text message, KHALIL KHALIL stated as follows, in substance and in part:

KHALIL KHALIL: Sunday \$1,635
 Inventory remaining:
 189w
 32m
 344blu
 119adi (20mg)
 100xan

Based on my experience, training, and investigation of this matter, I believe that by this text message, KHALIL KHALIL was informing MICHAEL KHALIL regarding his supply of cocaine ("189w"), MDMA ("32m"), oxycodone pills ("344blu"), Adderall pills at 20 milligrams ("119adi (20mg)"), and Xanax pills ("100xan").

ii) On or about November 25, 2016, at approximately 6:07 p.m., KHALIL KHALIL placed an outgoing call using the 8598 Number to MICHAEL KHALIL using the 0676 Number (Session 2170). During that call, the following conversation, in sum and substance, took place:

KHALIL KHALIL: Hello, what was the total inventory from yesterday?
 MICHAEL: Didn't you see the fucking picture I sent you?
 KHALIL KHALIL: Yeah [inaudible] did you put it in your nose?
 MICHAEL: Yeah, I did put it in my nose. Inventory, 7 whites, 7 times 32 times.
 KHALIL KHALIL: 7 whites, alright, and how many addies?

¹⁴ I have viewed the driver's license photo of MICHAEL KHALIL and have also participated in surveillance during which I have observed the same individual, MICHAEL KHALIL, act as a runner for KHALIL KHALIL. In addition, telephone records for the 8598 Number confirm communications with the 0676 Number on dates that MICHAEL KHALIL is acting as a runner for KHALIL KHALIL, including dates on which UC-1 has conducted controlled buys such as the one described above in paragraph (o).

MICHAEL: 5.
 KHALIL KHALIL: How many blues?
 MICHAEL: 6.
 KHALIL KHALIL: Anything else that I need to know?
 MICHAEL: No [inaudible]
 KHALIL KHALIL: Now, one more question, what do you have that you owe me for Thursday? Wednesday is accurate, but what do you got for Thursday?
 MICHAEL: Thursday, including 7 w's from inventory, 62 minus.

Based on my experience, training, and investigation of this matter, I believe that during this call KHALIL KHALIL and MICHAEL KHALIL were discussing their supply of \$100 bags of cocaine ("7 whites"), Adderall pills ("how many addies"), and oxycodone pills ("how many blues").

iii) On or about December 1, 2016, beginning at approximately 7:00 p.m., KHALIL KHALIL received an incoming call on the 8598 Number from MICHAEL KHALIL using a call number ending in 9121 ("the 9121 Number") (Session 3626).¹⁵ During that call, the following conversation, in sum and substance, took place:

MICHAEL: Joe? You can talk or not?
 KHALIL KHALIL: Yeah.
 MICHAEL: Let me ask you a question, the addies that you left me in your house, the ones [Unintelligible]
 KHALIL KHALIL: Yeah, those are 30 milligrams.
 MICHAEL: Those are 30? So which ones should I take? The 20s or the 30s?
 KHALIL KHALIL: Take what's in my house first and then we worry about what. The only that you [unintelligible] Ahmed gave technically was the M, but obviously, whatever M's, whites doesn't really fucking matter. But everything else, I left for you prepared.
 MICHAEL: Ok, so [Voices overlap]
 KHALIL KHALIL: I would take the M's from where Ahmed's stuff was and leave everything else on the side and start using what I left you on the closet.

¹⁵ I have reviewed photos of a person named "Michael Khalil" posted on a Facebook account in the name "Michael Khalil" and, based on my comparison of those photos with the driver's license photo of MICHAEL KHALIL, I believe that the Facebook account belongs to MICHAEL KHALIL. This Facebook account lists the 9121 Number as MICHAEL KHALIL's phone number.

MICHAEL: Am I taking everything with me or leaving it at the house?

KHALIL KHALIL: I mean load up. You should know by now what a regular load of business [is]. Take at least 100 blues, take fucking 30 addies, 30 xannies, take the whole xannies, 50 I think you gonna drop them at one person alone. Take all the xannies and take all the [unintelligible].

MICHAEL: I gotta go to the house? Because I only have 40 xannies here.

KHALIL KHALIL: Yeah, you got the 37 from yesterday and the 13 from Ahmed, that's 50 right. Perfect.

MICHAEL: No, but I only have 27 on me and yesterday . . .

KHALIL KHALIL: Fine you could stop by my house first, go for it, just load up once.

MICHAEL: Ok, so the pink ones that you left at my house, at your house.

KHALIL KHALIL: Those are the ones we're gonna use, 30.

KHALIL KHALIL: Bye.

Based on my experience, training, and investigation of this matter, I believe that in these text messages KHALIL KHALIL and MICHAEL KHALIL were discussing the available supply of narcotics, including Adderall ("addies"), \$100 bags of cocaine ("whites"), ecstasy ("M") and Xanax ("xannies"), and, in particular, how much of each MICHAEL KHALIL would need to make deliveries to KHALIL KHALIL's customers. KHALIL KHALIL explained that a "regular load of business" for delivery included at least 30 Adderall, 30 Xanax, and 100 oxycodone pills.

iv) On or about December 5, 2016, beginning at approximately 7:23 p.m., KHALIL KHALIL placed an outgoing call using the 8598 Number to MICHAEL KHALIL using the 9121 Number (Session 4264). During that call, the following conversation, in sum and substance, took place:

MICHAEL: Hello?

KHALIL KHALIL: [Unintelligible]

MICHAEL: What up?

KHALIL KHALIL: Okay, um . . . are you in your house yet or . . .

MICHAEL: I just talked, I went to the store real quick.

KHALIL KHALIL: Alright. So I don't want you to take forever in the office, so what I would love for you to do is count everything. Now let me ask you a question. [Stammers] the, um, those Addies that were in a particular bag did you ever go through those, count those?

MICHAEL: No, there was like 77 or something?
KHALIL KHALIL: Yeah, exactly. Just keep that separate, so that way we don't confuse ourselves. Put that put that in my closet on the top, just put that there for now. Um, just that we we don't mix that number with, with the office stuff and the thing you took from Hamud.
MICHAEL: Gotcha.
KHALIL KHALIL: Alright, just tell me when you're in the office. Listen, count, count everything and call me, bye.

Based on my experience, training, and investigation of this matter, I believe that in in this call KHALIL KHALIL and MICHAEL KHALIL were discussing KHALIL KHALIL's supply of Adderall ("those Addies") which MICHAEL KHALIL stated totaled 77. KHALIL KHALIL instructed MICHAEL KHALIL to keep those pills separate from "the office stuff," a reference to other drugs maintained at KHALIL KHALIL's residence in Manhattan.

v) On or about December 20, 2016, beginning at approximately 12:47 p.m., KHALIL KHALIL received an incoming phone call on the 8598 Number from MICHAEL KHALIL using the 9121 Number (Session 5592). During that call, the following conversation, in sum and substance, took place:

KHALIL KHALIL: You are gonna give him . . . the person you are giving it to is Jason, so you are good. So I'm gonna have Jason, I'm gonna ask Jason to meet you at 6:00 o'clock sharp at the office that way you can get rid of him immediately.
MICHAEL: No doubt. You have to remind me what to do.
[VOICES OVERLAP]
KHALIL KHALIL: By the way, I mean . . . you are gonna make a lot of cash money [unintelligible] also as far from my part as well, 'cause one guy didn't meet you in the office its getting 20 blues, and whites, so that's already almost a thousand dollar right there. And then I got a few people lined up already so, it's gonna be a good night.

Based on my experience, training, and investigation of this matter, I believe that, during this call, KHALIL KHALIL was instructing MICHAEL KHALIL to sell 20 oxycodone pills ("20 blue") and an unspecified number of \$100 bags of cocaine ("whites") to an unidentified individual.

THOMAS CORCORAN, a/k/a "Tony"

q. THOMAS CORCORAN is a long-time associate of KHALIL KHALIL. Among other things, THOMAS CORCORAN acted as a courier for KHALIL KHALIL, delivering narcotics, including cocaine, oxycodone, and Xanax, on behalf of KHALIL KHALIL.

r. On or about November 19, 2016, at approximately 2:45 a.m., KHALIL KHALIL using the 8598 Number, received a text message from THOMAS CORCORAN using a call number ending in 9954 (the "9954 Number")¹⁶ (Session 543). In that text message, CORCORAN stated as follows, in substance and in part: "D Joe 1w Plus 20\$ douche bag tax". Based on my experience, training, and my participation in the investigation of this matter, I believe that, in this text message, CORCORAN was informing KHALIL KHALIL that a customer ("D Joe") had purchased one bag of cocaine ("1w"). Further, I believe that CORCORAN informed KHALIL KHALIL that he had raised the price by approximately \$20 ("Plus 20\$ douche bag tax").

s. On or about November 19, 2016, at approximately 8:15 p.m., KHALIL KHALIL received an incoming phone call on the 8598 Number from THOMAS CORCORAN using the 9954 Number (Session 713). During that conversation, the following conversation, in sum and substance, took place:

KHALIL KHALIL: Hello.

CORCORAN: I am in the house right now. You want me to come see you first?

KHALIL KHALIL: No, why would you do that? Just go straight to Brooklyn cause as long as you read my text messages, if you have 10 blues, 15 xan, get Brooklyn out of the way. Why you gonna come here and then go to Brooklyn?

CORCORAN: Oh, for some reason I was thinking it was New Jersey. I am sorry.

KHALIL KHALIL: No, it's Brooklyn. It's right here. The gy [sic] you took care a few times already.

¹⁶ Based on my conversations with other law enforcement agents and my participation in the investigation of this matter, I have learned, in substance and in part, that KHALIL KHALIL, using the 8598 Number, and the 9954 Number were in frequent contact on nights when KHALIL KHALIL indicated to customers that "Tony" would be making deliveries. Based on my conversations with other law enforcement agents and my participation in this investigation, I have learned, in substance and in part, that during subsequent physical surveillance of those transactions, the same person as appears in the driver's license photo of THOMAS CORCORAN is the individual who completed those transactions.

CORCORAN: No, no problem. I'll come see after that when I am done.

KHALIL KHALIL: Ok, perfect. Yeah, do that exactly. Go to Brooklyn and come straight to me. I am already ready, I've got plenty of stuff ready. I am just bagging extras so I want to, to work.

CORCORAN: No, no. I am saying I thought that you were working already. That's why I had asked if can stop . . .

KHALIL KHALIL: I fucked up my whole schedule today, but we're good. We're not [inaudible] rush, I mean I do have a few people waiting, blue, yes go to Brooklyn and come straight to me.

CORCORAN: All right, I am on my way right now.

KHALIL KHALIL: When you get in your car confirm with me that you got 15 xans and 10 blues.

CORCORAN: Okay, no doubt.

Based on my experience, training, and participation in the investigation of this matter, I believe that, during this conversation, KHALIL KHALIL was confirming how many oxycodone and Xanax pills CORCORAN had in his possession and directed CORCORAN to carry out a narcotics transaction in Brooklyn ("just go straight to Brooklyn cause as long as you read my text messages, if you have 10 blues, 15 xan get Brooklyn out of the way").

t. On or about November 19, 2016, at approximately 10:04 p.m., KHALIL KHALIL, using the 8598 Number, sent a text message to THOMAS CORCORAN, using the 9954 Number (Session 762). In that text message, KHALIL KHALIL, stated as follows, in substance and in part:

KHALIL KHALIL: 75w
16m
60adi (20mg)
40xan
100blu

Based on my experience, training, and investigation of this matter, I believe that by this text message, KHALIL KHALIL was informing MICHAEL KHALIL regarding his supply of cocaine ("75w"), MDMA ("16m"), Adderall pills at 20 milligrams ("60adi (20mg)"), Xanax pills ("40xan"), and oxycodone pills ("100blue").

u. On or about December 3, 2016, at approximately 5:43 p.m., KHALIL KHALIL, using the 8598 Number, received a text message from THOMAS CORCORAN, using the 9954 Number (Session 3939). In that text message, CORCORAN stated as follows, in substance and in

part: "D Russle 9 blue 8 xan." Based on my experience, training, and participation in the investigation of this matter, I believe that, in this text message, CORCORAN was telling KHALIL KHALIL that he had sold approximately nine oxycodone pills ("9 blu") and approximately eight Xanax pills ("8 xan") to a customer ("D Russle").

v. On or about December 3, 2016, at approximately 6:44 p.m., KHALIL KHALIL, using the 8598 Number, received a text message from THOMAS CORCORAN on the 9954 Number (Session 3968). In that text message, CORCORAN stated as follows, in substance and in part: "D venmo 6 blu 1 xan." Based on my experience, training, and participation in the investigation of this matter, I believe that, in this text message, CORCORAN was reporting to KHALIL KHALIL that CORCORAN had sold approximately six oxycodone pills ("6 blu") and approximately one Xanax pill ("1 xan") to a customer. Further, I believe that CORCORAN informed KHALIL KHALIL that the customer would be paying for the narcotics electronically using the service Venmo ("venmo").

KAMILE GORUR

w. KAMILE GORUR is an associate of KHALIL KHALIL. Among other things, GORUR packaged narcotics for KHALIL KHALIL.

x. On or about November 29, 2016, at approximately 9:50 a.m., KHALIL KHALIL received an incoming call on the 8598 Number from KAMILE GORUR, who was using a call number ending in 0072 (the "0072 Number") (Session 3158).¹⁷ During that call, the following conversation, in sum and substance, took place:

KHALIL: Um [PAUSE] besides that speaking about the other things we spoke about, were you definitely [PAUSE].
 GORUR: Um hum.
 KHALIL: Um [PAUSE] I'm definitely down for you to do it, the only thing is [PAUSE] [PAUSE] again if there is something that I don't want you doing it um [PAUSE] was Mike knowing about, fuck him I really don't want him knowing anything.

¹⁷ A person with name "Kamile Gorur" has a Facebook account which lists the 0072 Number as that person's phone number. In addition, credit bureau reports list the 0072 Number as a telephone number for a person with the name "Kamile Gorur." I am familiar with photos of "Kamile Gorur" appearing on this Facebook account, and I have observed this same person in the company of KHALIL KHALIL. Accordingly, I believe that KAMILE GORUR uses the 0072 Number.

GORUR: No, no. He doesn't know crap and I don't want him to know. I agree with you one thousand percent.

KHALIL: Yes, so [PAUSE] I'm just thinking [PAUSE] the best time to do it is when I'm [in] town because when I'm not in town my key is with Mike.

GORUR: I know, I know.

KHALIL: So, what time [PAUSE] why don't we do this what time do you work today?

GORUR: Three to [STUTTERS] three to eleven.

KHALIL: Then after eleven you gotta be in the phone with your husband for how long?

GORUR: No, no, no. He's home sleeping at that time. I don't talk to him until tomorrow once I come home from work today I don't talk to him you know until the next day.

KHALIL: Well, I'm thinking. Literally me thinking out loud [PAUSE].

GORUR: Me going down tonight and then doing it until whenever.

KHALIL: [MUMBLES].
[VOICES OVERLAP]

GORUR: That sounds good to me.

KHALIL: Yeah, I don't want you to be a fucking zombie but whatever I mean there is [UNINTELLIGIBLE]. Yeah, this is perfect like you can come down tonight right?

GORUR: Uh hum.

KHALIL: Even if you got tired and wanted and went to sleep which is fine. I don't expect you to do it overnight but when you wake up early you don't got work tomorrow until three so in other words you can come tonight do as much as you can obviously if you get tired you can sleep and then if you wake up early you [PAUSE] and again the best part about it you just gonna do as much as you can. Um [PAUSE].

GORUR: I know, I know.

KHALIL: Yeah, you don't have to do [UNINTELLIGIBLE] eight hundred.

GORUR: [CAUGHS]

KHALIL: For example right? So [PAUSE].

GORUR: Right.

KHALIL: So you do as much as you can tonight and tomorrow morning and then um [PAUSE] what do you call it? Sorry, and then I'm back whatever next week I guess.

GORUR: Uh hum.

KHALIL: Um, you can continue the rest when I'm back. You know what I'm saying? [UNINTELLIGIBLE].
[VOICES OVERLAP]

GORUR: That sounds good to me

. . .

Based on my experience, training, and investigation of this matter, I believe that, during this call, KHALIL KHALIL and GORUR were discussing GORUR packaging narcotics for KHALIL KHALIL.

y. On or about December 13, 2016, at approximately 11:42 a.m., KHALIL KHALIL placed an outgoing call from the 8598 Number to KAMILE GORUR on the 0072 Number (Session 4911). During that call, the following conversation, in sum and substance, took place:

. . .

KHALIL: I understand you always say that weekends is better for you, but I'll love... the sooner the better, so... I'm assuming you got work today, so if you want to do today after work that will be phenomenal. Don't you usually work daytime hours or you don't do daytime hours?

GORUR: No, Monday through Thursday [audio breaks] Friday and Saturday I do, 8:00 to 3:00.

KHALIL: Oh, that's what it was.

GORUR: Uh-huh.

KHALIL: Oh, that's right... the day that you worked, the day that you came here was that Friday?

GORUR: It was the week day, yeah.... it was like a Tuesday or Wednesday or something.

KHALIL: Oh, I picked you up at night? I'm bugging.

GORUR: Yeah, you picked me up before [Unintelligible] after you went to the airport.

KHALIL: Okay, so... definitely again . . . for me, the sooner you can come do this, the sooner I want to get the fuck out of here and go back to Buffalo, so I'm only here just to fucking prepare all over again, so... everything that you did, we already sold it, everything that you did is already gone, so...

GORUR: Alright, so tonight, is tonight good for you?

KHALIL: Yeah, that's perfect

GORUR: I'll even try to get out of work 9:00-10:00, but I'll let you know today, if I can get out at 9:00 I will let you know.

KHALIL: Sounds good, alright. So just keep me posted um... on timing.

GORUR: Okay.

KHALIL: I'll try my best to come pick you up, worse come to worse... we'll figure it out, I'll probably pay your cab or something. . . by the way the other day, I

don't know if Mike was trying to pull my dick, but...
 I don't know if you told him something [Stutters]
 [Voices Overlap]

GORUR: I definitely did not, cause he even brought that shit
 up to me, he was like "I asked Khalil who did this and
 he said [Unintelligible] and I thought it was you."
 I'm like [Unintelligible] for like a month.

KHALIL: Yeah, because he just like motherfucker... he was in
 the phone with me and he was telling me, "Yo, whoever
 bagged this up didn't fucking do it right, the second
 bag... they didn't light it... sealed it properly is
 like they didn't want to use their fingers."

GORUR: He even showed me the bag, I'm like "What's wrong with
 it." right. I'm like, "What's wrong with it?." He was
 like "Nothing, nothing."

KHALIL: Well look, this is what he was saying. So he was like,
 "Oh, whoever bagged it didn't fucking seal it right, I
 don't know if it was you or Kamile." like literally,
 he threw your name in there, so I'm like...
 [Voices Overlap]

GORUR: What I ...

KHALIL: I was like, "It was like me and somebody else." you
 know what I'm saying, but again... how he mentions
 your name that was just so awkward.

GORUR: Right definitely, I totally agree, cause he even said
 that he asked you and you said "You and someone." I
 said "[Unintelligible] in like a month."

KHALIL: Yeah, he's like all up in my business... for the
 record, there's someone, with always used Yaba
 [phonetic] my fitness trainer, the guy that you met a
 few times.

GORUR: Yeah, yeah, let's use him.

KHALIL: We going to use him, but yeah . . . I mean ... you
 probably don't [Stutters] you probably can just keep
 the guy there.... then a [Stutters] whatever, you
 could just say it was probably [Stutters] his friend
 that he workouts with, tell him like, "One time... you
 saw his friend that workouts with him, he was over his
 house helping him out." whatever, you can say some
 shit like that.

. . . .

Based on my experience, training, and investigation of this
 matter, I believe that, during this call, KHALIL KHALIL and GORUR
 were discussing when GORUR could next package narcotics for KHALIL
 KHALIL because everything that GORUR had previously packaged had
 already been sold (KHALIL: "I'm only here just to fucking prepare

all over again, so... everything that you did, we already sold it, everything that you did is already gone, so..."), as well as a previous packaging job that GORUR did for KHALIL KHALIL that "Mike" did not think was done well ("So he was like, 'Oh, whoever bagged it didn't fucking seal it right'").

JASON NGUYEN

z. JASON NGUYEN is an associate of KHALIL KHALIL. Among other things, NGUYEN and KHALIL KHALIL sell Adderall pills. Specifically, NGUYEN acts as a supplier to KHALIL KHALIL, regularly providing KHALIL KHALIL with resale quantities of Adderall.

aa. On or about November 28, 2016, at approximately 2:31 p.m., KHALIL KHALIL received an incoming call on the 8598 Number from JASON NGUYEN using a call number ending in 6156 (the "6156 Number") (Session 2965).¹⁸ During this phone call, the following conversation took place, in substance and in part:

NGUYEN: Hey what's up?
 KHALIL KHALIL: What's going on?
 NGUYEN: Umm . . . I'm going to pick the money in a little bit and then later on tonight I'm going to drop off the stuff to you.
 KHALIL KHALIL: Correct. I'll have the difference.
 NGUYEN: No, no. He is going to give you 250 instead of the 300. It's pretty much [unintelligible] exactly what I'm picking up.
 KHALIL KHALIL: Alright, sounds good.
 NGUYEN: Umm . . . do you want another 150 adds from Luigi? He said he has been hitting you up for it.
 KHALIL KHALIL: Act like you can't get in contact with me . . . whatever, he is fucking annoying. He calls me 100 times a day, so now I'm just ignoring him, so that I can teach him a fucking lesson. But, I'm going to grab them from him, don't worry about it. I'm going to grab it from him. The guy needs to understand . . .
 [Voices Overlap]

¹⁸ According to subscriber records, the subscriber of the 6156 Number is a relative of JASON NGUYEN, with an address in Bloomfield, New Jersey. Law enforcement agents have observed the same person as appears on the driver's license of JASON NGUYEN entering this Bloomfield, New Jersey address. Furthermore, in numerous communications intercepted pursuant to the Khalil Wires, the male using the 6156 Number is referred to as "Jason".

NGUYEN: He needs to get rid of them today, that's why.

KHALIL KHALIL: That's fine. I'm going to grab it from him. I'm going to keep ignoring until I'm ready to answer his fucking phone calls, dude. I just arrived last night. The nigga doesn't let me fucking sleep, he wants me to fucking do shit on his own time. Last night I had a long fucking day, I went home, I went to fucking sleep. Today, I got to run around to collect money and then I'm going to have money and then I'm going to have money and then I'll but it from him, but I can't meet up with him with no money. And he just put so much pressure in it. Dude, if I don't got it, I don't got it. So, he needs to understand that. But, whatever, I will reach out to him. I'm going to text him. If anything, I didn't answer you.

NGUYEN: Yeah, he is giving you take for 10, so . . . whatever, you just work out the number with him. He owes you money, right?

KHALIL KHALIL: If he'll give it to you for 10 get it, he is a fucking scumbag.

NGUYEN: You want me to get it or you want, want to get it?

KHALIL KHALIL: I want you to get it, get it . . . just act like you didn't speak to me. Check it and then what I'll do . . . I'll still give him the credit, I'll just deduct from the money that he fucking owes me. So he's fucking giving me \$100 towards the number that's it.

NGUYEN: Okay, alright . . . yeah, that's fine. When I meet up with you later, I'll grab the money, his stuff, and then I get next to you.
[Voices Overlap]

KHALIL KHALIL: Alright, done. [Unintelligible] you got it, peace.

NGUYEN: Alright, bye.

Based on my experience, training, and my participation in the investigation of this matter, I believe that, during this call, NGUYEN was informing KHALIL KHALIL that another individual would be providing KHALIL KHALIL with 250 instead of 300 pills of an undisclosed type ("he is going to give you 250 instead of 300, it's pretty much [unintelligible] exactly what I'm picking up."). Furthermore, NGUYEN asked KHALIL KHALIL if he was interested in purchasing an additional 150 Adderall pills that LUIGI MIGLIACCIO was selling ("do you want another 150 adds from Luigi? He said he has been hitting you up for it."). KHALIL KHALIL instructed NGUYEN to pick up the Adderall pills from MIGLIACCIO and provide them to KHALIL KHALIL ("I want you to get it, get it . . . just act like

you didn't speak with me, check it, and then what I'll do . . . I'll still give him the credit").

bb. On or about December 12, 2016, at approximately 11:33 p.m., KHALIL KHALIL received an incoming phone call on the 8598 Number from JASON NGUYEN using the 6156 Number (Session 4826). During that phone call, the following conversation took place, in substance and in part:

NGUYEN: Hey, what's up?
 KHALIL KHALIL: How you doing?
 NGUYEN: I'm at the [Unintelligible] watching the football game.
 KHALIL KHALIL: Ni [sic], now you hanging out with the Jews.
 NGUYEN: I was hanging out by myself.
 KHALIL KHALIL: No doubt. Alright, so, just so that we on the same page, I met up with your buddy and . . .
 [Voices Overlap]
 NGUYEN: Okay.
 KHALIL KHALIL: I owe him \$3,600, okay. 'Cause he gave me more stuff. I didn't have all the cash on me, so I just gave him what I had, so I owe him 36. So, I told him I can give it to him tomorrow, but he told me to give it to you, because it's easier for him, so I told him "no doubt."
 [Voices Overlap]
 NGUYEN: Yeah, yeah.
 KHALIL KHALIL: He said he might give you 100 more Adidas, so if he gives you 100 more Adidas, I'll pay for the [unintelligible] also.
 NGUYEN: I actually have 60 of them on me, I want to give it to you.
 KHALIL KHALIL: That's fine, that's fine. You could do it one shot tomorrow. I don't even got bread on me, gave [audio breaks] all my money.
 NGUYEN: Okay.
 KHALIL KHALIL: So, tomorrow, I'll have the \$3,600 I owe him. I'll have the 8,500 I owed Done and I'll have more money uh . . . you have the 60 Addys, if you have the 100 Addys, I'll pick up [Unintelligible]
 NGUYEN: Okay.
 KHALIL KHALIL: Sounds good.
 NGUYEN: What you doing tonight
 KHALIL KHALIL: I'm actually . . . I might go to a going to a Hookah lounge here in the city, some little [unintelligible] spot, I don't even know where it is, but let me find out where it is, I'll let you

know. I'ma text you before I leave. Give me like fucking 15 minutes, I'll let you know.
NGUYEN: Alright. Later.

Based on my experience, training, and my participation in the investigation of this matter, I believe that, during this phone call, KHALIL KHALIL and NGUYEN were discussing a previous narcotics transaction between KHALIL KHALIL and a third-party in which KHALIL KHALIL purchased additional narcotics ("he gave me more stuff"). KHALIL KHALIL did not have sufficient funds to pay for the narcotics that he purchased ("I didn't have all the cash on me, so I just gave him what I had"). KHALIL KHALIL explained that he would give the remaining cash to NGUYEN to provide to the third-party ("he told me to give it to you, because it's easier for him"). KHALIL KHALIL then informed NGUYEN that the third-party might provide NGUYEN with an additional 100 Adderall pills, which KHALIL KHALIL would then purchase ("He said he might give you 100 more Adidas, so if he gives you 100 more Adidas, I'll pay for the [Unintelligible] also.").

cc. On or about December 13, 2016, at approximately 6:52 p.m., KHALIL KHALIL received an incoming phone call on the 8598 Number from JASON NGUYEN using the 6156 Number (Session 5000). During that phone call, the following conversation took place, in substance and in part:

KHALIL KHALIL: What's up, brother?
NGUYEN: Yo, I'll be by you in 15 minutes.
KHALIL KHALIL: Okay-dokey.
NGUYEN: I have 110 Adds.
KHALIL KHALIL: Okay.
NGUYEN: And that's it.
KHALIL KHALIL: Okay, that's fine.
NGUYEN: Yeah, give me 36 plus 85.
KHALIL KHALIL: You know what I realized I'm a fucking idiot. I left all the fucking cash in my car and I put my car in the parking lot. I hope the fucking parking attendant don't fucking open up my middle console. Shit is right there.
NGUYEN: In your place?
KHALIL KHALIL: Yeah, it's here, it's here at my parking spot. I'm just saying, like, you know, I forgot to unload it with me in my house. So, God forbid, like, you know, one of the parking guys happens to open up . . . like my middle console for any fucking reason, he's going to find all that fucking money right in front

of his face. You know this motherfucker quit their job and leave [laughs].

NGUYEN: Alright, I'll be right there. I'll be there son.

KHALIL KHALIL: Yeah, so I'm fucking going there now.

NGUYEN: 36 and 1550 and then 85.

KHALIL KHALIL: Yes, absolutely.

NGUYEN: Put the 85 in a envelope if you could.

KHALIL KHALIL: I got you. Let me see what's up. I'll let you know. Bye.

NGUYEN: Alright, I'll be there in 15 minutes.

KHALIL KHALIL: Bye.

Based on my experience, training, and participation in the investigation of this matter, I believe that, during this conversation, NGUYEN was offering KHALIL KHALIL approximately 110 Adderall pills ("I have 110 Adds"). NGUYEN and KHALIL KHALIL then discussed the price of the pills ("Yeah, give me 36 plus 85."). Based on my training and experience, and my participation in the investigation of this matter, I believe that "36" means \$3,600 and that "85" means \$8,500.

ANTHONY MEDEIROS

dd. ANTHONY MEDEIROS is a long-time associate of KHALIL KHALIL. MEDEIROS and KHALIL KHALIL supply one another with narcotics for resale, including oxycodone, Adderall, and Xanax.

ee. On or about January 5, 2017, at approximately 9:38 p.m., KHALIL KHALIL placed an outgoing phone call using the 8598 Number to ANTHONY MEDEIROS using a call number ending in 3662 (the "3662 Number") (Session 7534).¹⁹ During that call, the following conversation, in sum and substance, took place:

MEDEIROS: Hey buddy.

KHALIL: What's up buddy? Where are you?

MEDEIROS: Umm... pulling up till I get to the gas station. Alright like 10 seconds [Pause] at the gas station where [Unintelligible] is.

¹⁹ A person with the name "Anthony Medeiros" has a Facebook account on which he lists the 3662 Number as his phone number. I have reviewed photographs of "Anthony Medeiros" from this Facebook account and believe it is the same person depicted on the driver's license of ANTHONY MEDEIROS. In addition, the male using the 3662 Number has identified himself as "Anthony" or "Ant" in other communications with KHALIL KHALIL intercepted pursuant to the Khalil Wires.

KHALIL: Where are you?
 MEDEIROS : I'm on umm...
 [VOICES OVERLAP]
 KHALIL: I am nowhere near a gas station.
 MEDEIROS : 78th street I am on right now, half of 78th.
 So...
 KHALIL: I am on 77th. Where are you going?
 MEDEIROS : Yeah so umm I should be meeting you right... umm
 fuck I missed you. Alright I'm a just going to
 hit 79th, I got to turn around.
 [VOICES OVERLAP]
 KHALIL: If you are at 79th make a right and then make
 another right. Whatever...
 [VOICES OVERLAP]
 MEDEIROS : I got you. I got you.
 KHALIL: And then make a right off 77th, and come between
 first and second.
 MEDEIROS : I got you. I am just turning back around. So you
 want to go on first ave though?
 KHALIL: No. Where were you on? You were on 1st ave?
 MEDEIROS : I was on 1st ave.
 KHALIL: Okay so make your next right, and then you are
 going to make another right onto York avenue. So
 when you make a right onto York, you got to make
 another right onto 77th.

On or about January 5, 2017, at approximately 11:29 p.m.,
 KHALIL KHALIL and MEDEIROS then engaged in a series of text
 messages using the same call numbers:

MEDEIROS: Can you do me a solid brotha? Can I buy some
 Ad-vertising posters back from you? If you can
 spare 5-10 that would be phenomenal I'll be
 pulling up in like 2 min
 KHALIL: Ok

Based on my experience, training, and investigation of this
 matter, I believe that, during these calls and text messages KHALIL
 KHALIL was arranging to meet MEDEIROS initially to purchase pills
 from MEDEIROS, and then later to sell him back 5-10 Adderall pills
 ("ad-vertising posters") in the area near KHALIL KHALIL's
 apartment in Manhattan.

ff. On or about January 16, 2017, beginning at
 approximately 10:05 p.m., KHALIL KHALIL using the 8598 Number,
 exchanged a series of text messages with ANTHONY MEDEIROS using a

call number ending in 2726 (the "2726 Number")²⁰ (Sessions 8809 - 8816), including the following:

MEDEIROS: Hey brotha can I scoop a few more of those pink slips from you ? Btw there are gonna be some on this next order

KHALIL: 10?

MEDEIROS: Be great if not whatever you can Outside
Are you coming out or go to the door?

Based on my experience, training, and investigation of this matter, I believe that during this text message exchange, KHALIL KHALIL and MEDEIROS were discussing MEDEIROS buying Adderall ("pink slips") from KHALIL KHALIL.

gg. On or about January 27, 2017, at approximately 2:51 p.m., KHALIL KHALIL, using the 8598 Number, placed a call to ANTHONY MEDEIROS using the 2726 Number. During that call, the following conversation, in substance and in part, took place. MEDEIROS told KHALIL KHALIL that "the guy" needs MEDEIROS to go to Long Island, which is different from what MEDEIROS was going before, because before he was going to Brooklyn. MEDEIROS told KHALIL KHALIL that the guy has "it," but that he cannot see MEDEIROS until Monday, so now he is going to get paid twice next week.

KHALIL: Twice next week is perfect, that's fine with me, so Monday you said um.... how many going to have on Monday?

MEDEIROS: It's going to be like five and... I don't know, probably some of the... some of the other ones, you know the m's.

KHALIL: Yeah and also get me the bars if you could get me some bars.

MEDEIROS: Alright, yeah you got it.

KHALIL: I'll take 500 or 1,000, I don't even give a fuck.

MEDEIROS: It's up to you whatever, if [sic] got 1,000 now, but I

²⁰ In communications intercepted pursuant to the Khalil Wires, the user of the 2726 Number has arranged various narcotics transactions and, during subsequent physical surveillance of certain of those transactions, law enforcement confirmed that the individual completing the transactions is the same person depicted on ANTHONY MEDEIROS's driver's license. In addition, in numerous communications intercepted pursuant to the Khalil Wires, the male using the 2726 Number identified himself as "Anthony" or "Ant."

could take whatever.

KHALIL: Alright, so bring the 1,000 I'll take the thousand.

MEDEIROS: But [Stutters] are you going to be ready for Friday?

KHALIL: Of course dude, next week is going to be a good week man, I got you.

. . . .

Based on my experience, training, and investigation of this matter, I believe that in this conversation, MEDEIROS and KHALIL KHALIL were discussing a source of narcotics in Long Island, and KHALIL KHALIL was requesting oxycodone ("m's") and Xanax ("bars").

hh. On or about January 27, 2017, at approximately 3:02 p.m., KHALIL KHALIL, using the 8598 Number, placed a call to ANTHONY MEDEIROS using the 2726 Number. During that call, the following conversation, in substance and in part, took place:

KHALIL: I can give you the 10K and then every week I'm seeing you right? To buy jeans from you.

MEDEIROS: Yeah.

KHALIL: So you can be giving me, you can give me like 100 "Blue Jeans" towards debt. So you can be done with me for example you can be done with me like in 5 weeks or something.

MEDEIROS: Yeah, I got you.

KHALIL: I don't know. You got to tell me what is good within your financial records.

MEDEIROS: We can figure it out. I guess when I see you. Let me know if it's possible and then we'll go over and see where we are at at [sic] that point. I mean who knows if it ends up being 3 weeks from now maybe i'll be alright. I don't know you know?

KHALIL: You are right. I respect that. Aight.

Based on my experience, training, and investigation of this matter, I believe that in this conversation, MEDEIROS and KHALIL KHALIL were discussing MEDEIROS giving KHALIL KHALIL oxycodone ("blue jeans") as repayment for a loan that KHALIL made to MEDEIROS.

LUIGI MIGLIACCIO

ii. LUIGI MIGLIACCIO is an associate of KHALIL KHALIL. MIGLIACCIO and KHALIL KHALIL engage in the sale of Adderall and oxycodone. Specifically, MIGLIACCIO acts as a supplier to KHALIL KHALIL, regularly providing KHALIL KHALIL with resale quantities of Adderall and oxycodone.

jj. On or about November 24, 2016, at approximately 9:28 a.m., KHALIL KHALIL received a text message on the 8598 Number from LUIGI MIGLIACCIO using a call number ending in 2936 (the "2936 Number") (Session 1911).²¹ In that text message, MIGLIACCIO stated as follows, in substance and in part:

MIGLIACCIO: I have 150addy 30s for u on saturday..u want them right? I am gonna hold them for u

Based on my experience and training, and my participation in the investigation of this matter, I believe that, in this text message, MIGLIACCIO was informing KHALIL KHALIL that MIGLIACCIO was in possession of approximately 150 30 milligram Adderall pills ("I have 150addy 30s for u") for sale. Furthermore, I believe that MIGLIACCIO then informed KHALIL KHALIL that he would hold onto the Adderall pills in order to provide KHALIL KHALIL with an opportunity to decide whether or not he intended to purchase the pills ("I'm gonna hold them for u").

WESLEY PEARSE

kk. WESLEY PEARSE is an associate of KHALIL KHALIL and supplied KHALIL KHALIL with narcotics, including cocaine and Adderall.

ll. On or about January 14, 2017, beginning at approximately 4:14 p.m., KHALIL KHALIL received an incoming phone call on the 8598 Number from WESLEY PEARSE using a call number

²¹ LUIGI MIGLIACCIO previously used a call number ending in 1073 (the "1073 Number"). The 1073 Number was linked to the Facebook page of "Luigi Migs." Many Facebook friends of "Luigi Migs" have the last name "Migliaccio." On many occasions MIGLIACCIO, using the 1073 Number in communications intercepted pursuant to the Khalil Wires, referred to himself as "Lu". On or about November 23, 2016, at approximately 4:02 p.m., MIGLIACCIO, using the 2936 Number, sent a text message to KHALIL KHALIL on the 8598 Number, in which MIGLIACCIO stated: "Yo hit me up on this phone when you get back on sat.. My new number lu."

ending in 2012 ("the 2012 Number") (Session 8441).²² During that call, the following conversation, in sum and substance, took place:

PEARSE: . . . I have the Addys for you, I'm just going to give you... I'm just going to give you like a [sic] from the prescription that I got.

KHALIL: Alright.

PEARSE: And then uhm... if you can... I don't know who's gonna want, but I would definitely bring little of the regular.

KHALIL: Alright, you got it, no problem. First of all just for you, cause I don't want to carry nothing me.

PEARSE: No, no, alright.. if you bringing it for me then yeah, yeah.... whatever you got just bring me and then if anybody wants we'll sell it. Alright?

KHALIL: Alright brother.

Based on my experience, training, and investigation of this matter, I believe that during this call, KHALIL KHALIL and PEARSE were discussing PEARSE selling Adderall ("Addys") to KHALIL KHALIL, as well as KHALIL proving cocaine ("the regular") to PEARSE for sale.

DERRICK CHAN

mm. DERRICK CHAN is an associate of KHALIL KHALIL who, amongst other things, provided KHALIL KHALIL with oxycodone and Adderall and was knowledgeable about installing secret compartments in cars used to conceal contraband such as narcotics.

nn. On or about November 29, 2016 at approximately 9:50 p.m., KHALIL KHALIL received an incoming call on the 8598 Number from DERRICK CHAN, using a call number ending in 2348 (the "2348

²² "Wesley Pearse" is listed as the subscriber of the 2012 Number. In communications intercepted pursuant to the Khalil Wires, the user of the 2012 Number has arranged various transactions and, during subsequent physical surveillance of certain of those transactions, law enforcement confirmed that the individual completing them is the same person depicted on WESLEY PEARSE's driver's license.

Number") (Session 3307).²³ During that call, the following conversation, in substance and in part, took place:

KHALIL: Hello.
 CHAN: You need "blue jean [Unintelligible]
 KHALIL: Do I need? I always need. The only thing is I can't see you 'til Monday. Paper.
 CHAN: Till Monday next week?
 KHALIL: Yeah. What's today? Today is already fucking Tuesday. Monday yeah.

Based on my experience, training, and investigation of this matter, I believe that, in this telephone conversation, KHALIL KHALIL and CHAN were discussing CHAN providing KHALIL KHALIL with oxycodone ("blue jean").

oo. On or about December 15, 2016, at approximately 7:34 p.m., KHALIL KHALIL received an incoming call on the 8598 Number from DERRICK CHAN on the 2348 Number (Session 5410). During that call, the following conversation, in substance and in part, took place:

KHALIL: Hello?
 CHAN: What up, you called me?
 KHALIL: Yeah, um, I'm about to leave my house so I wanted to know how many you got so I could take the money with me.
 CHAN: Ah 3 something, almost 400. 400.
 KHALIL: Um, all BLUE right?
 CHAN: All "K"s yeah.
 KHALIL: Ah, alright yeah thats fine. Yeah, I'll take whatever you have.
 CHAN: You wanted ADDY's you said? I have 50 Addy's if you want.
 KHALIL: No, I don't need them. I mean I really don't need them. I got...
 CHAN: [Unintelligible]
 KHALIL: Yeah but how many Addy's do you owe me? 98?
 CHAN: How do I owe you, I already paid you it.
 KHALIL: Oh okay just making sure. [Laughs]

²³ The 2348 Number is subscribed to by a family member of DERRICK CHAN. In communications intercepted over the Khalil Wires, KHALIL KHALIL has referred to the male caller using the 2348 Number as "Derrick." In addition, public records list as the address associated with the 2348 Number the same address as appears on DERRICK CHAN's driver's license.

CHAN: Nigga.
 KHALIL: Nigga gotta make sure. No doubt, so 21 you said?
 CHAN: 21.5
 KHALIL: Yo come one [sic]. Why you always jerking me for that .5?
 [Voices Overlap]
 CHAN: Yeah right. Hey, you go ask my guy! My guy, is telling me he is not changing it. I'm like okay. And he gave me an arm because he left to vaca and is coming back tomorrow. That's why I'm trying to get rid of it now. I've been holding onto it for week for you.
 KHALIL: Okay, I'll take it. Ummm, that's fine. Just count it one more time make sure you give exact count.
 CHAN: Aight, I'll count it right now.
 . . .

Based on my experience, training, and investigation of this matter, I believe that, in this telephone conversation, KHALIL KHALIL and CHAN were discussing CHAN providing KHALIL KHALIL with oxycodone ("all BLUE") and Adderall ("ADDY's"). KHALIL KHALIL and CHAN also argued over price ("KHALIL: Nigga gotta make sure. No doubt, so 21 you said? CHAN: 21.5 KHALIL: Yo come one [sic]. Why you always jerking me for that .5?").

pp. On or about January 25, 2017, at approximately 8:34 p.m., KHALIL KHALIL made an outgoing call on the 8598 Number to DERRICK CHAN on the 2348 Number (Session 8891). During that call, the following conversation, in substance and in part, took place:

KHALIL: What's up brother?
 CHAN: Yo, the grand total after the 2k is what? 126?
 KHALIL: 126, yeah.
 CHAN: Alright, cause nah... he just hit me up and heading to the city right now and go meet with them, I'ma figure out the number, alright?
 KHALIL: Sounds good, let me know.
 CHAN: Yo, when you want to do a box in your car?
 KHALIL: Hey yo, asap... I'm talking about, I can give you my car um... let's say Friday night, because Saturday morning I'm going to the airport, so I can leave you my car Friday night and I can leave that shit with you for whatever... how long.
 CHAN: Aight. Is one week, but aight.

Based on my experience, training, and investigation of this matter, I believe that, in this telephone conversation, KHALIL KHALIL and CHAN were discussing the installation of a secret

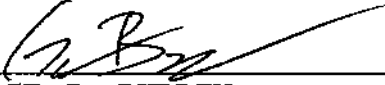
compartment in KHALIL KHALIL's car that could be used to conceal contraband, including narcotics ("when you want to do a box in your car?").

qq. On or about January 28, 2017, at approximately 2:08 p.m., KHALIL KHALIL made an outgoing call on the 8598 Number to DERRICK CHAN using the 2348 Number (Session 9524). During that call, the following conversation, in substance and in part, took place:

CHAN: Ohh! You see your buddy right?
KHALIL: Yeah, but that nigga... told me about his car, but when I do my car, I don't want you tell him about my car.
CHAN: I told him, I said, "Whoever you tell is up to you." He told me he told you, that's why I "Alright, that's on you." I said, "Nobody knows where my shit is."
KHALIL: Yeah... exactly. I don't want nobody to know.
CHAN: I can set you up, so it'll go up differently, where you got to press mad buttons that Niggas can't figure out no matter what.
KHALIL: No doubt, I'ma definitely do it.
[Voices Overlap]
CHAN: You hit like three buttons and it will do it. Mine is set up like that, my shit is no [Unintelligible] my shit is ... you hit buttons and the buttons open it.
KHALIL: I'ma definitely do it for sure, when I come back Monday, I'ma drop off my car do you, cause I'ma have to go to Buffalo Tuesday anyways, so I'll be gone for a week, so Monday night I'll drop off the car.
CHAN: You only have Tony doing your runs for you?
KHALIL: Nah, I don't have Tony no more, I got my brother actually. Just me and my brother right
....

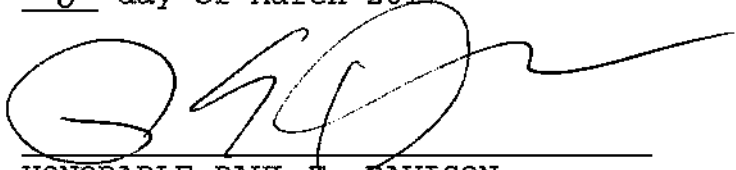
Based on my experience, training, and investigation of this matter, I believe that, in this telephone conversation, KHALIL KHALIL and CHAN were discussing the installation of a secret compartment in KHALIL KHALIL's car that could be used to conceal contraband, including narcotics. I further believe that "Tony" refers to THOMAS CORCORAN and that "my brother" refers to ALA KHALIL.

WHEREFORE, the deponent respectfully requests that KHALIL KHALIL, a/k/a "Vinny," and MEDRE MEDRE, ALA KHALIL, a/k/a "Steve," MICHAEL KHALIL, a/k/a "Nick," THOMAS CORCORAN, a/k/a "Tony," KAMILE GORUR, JASON NGUYEN, ANTHONY MEDEIROS, LUIGI MIGLIACCIO, WESLEY PEARSE, and DERRICK CHAN, the defendants, be arrested and imprisoned or bailed, as the case may be.



GEORGE J. BURDZY
Special Agent
Drug Enforcement Administration

Sworn to before me this
8 day of March 2017



HONORABLE PAUL E. DAVISON
United States Magistrate Judge
Southern District of New York